

thereby implement a specific rate directive in the 2010 Rate Order for the “next rate case.” CTA/Metra Ex. 1.0, p.4. The Commission Group believes that if the Commission does adopt this interpretation, then the Commission should implement the various directives for the “next rate case” that were specified in the 2010 Rate Order, including taking the next step toward moving the rate classes to cost and separating the SEC and SERVICE elements in ComEd’s distribution loss study. CG Ex. 1.0, pp.3-4.

Also with respect to line losses, the Commercial Group agrees with Staff witness Rockrohr (ICC Staff Exs. 11.0, 22.0) and Department of Energy witness Etheridge (DOE Ex. 1.0) that if distribution line losses are updated with new class load data (as ComEd proposes in its Exhibit 7.1), then updated transmission loss data should be incorporated as well. In such event, the Commission should use the line losses found in Study Report #7B, which ComEd has indicated are the same line loss elements found in ComEd Ex. 7.1 but with updated transmission line losses. On the other hand, if the Commission determines that such updates constitute rate design and/or class allocation changes barred by statute from implementation in this proceeding, the Commission should use the line losses adopted in the 2010 Rate Order. Finally, as stated above, if the Commission adopts Mr. Bachman’s alternative interpretation, whatever loss study adopted in this proceeding should include separated SEC and SERVICE elements.

Respectfully submitted this 29th day of February, 2012.

/S/ Alan R. Jenkins

Alan R. Jenkins
Jenkins at Law, LLC
2265 Roswell Road, Suite 100
Marietta, GA 30062
(770) 509-4866
aj@jenkinsatlaw.com

Attorneys for The Commercial Group